

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

JAN 18 1994

100-111-1100

In the Matter of
NOTICE OF PROPOSED RULEMAKING
Vanity Call Sign System
For Amateur Radio Operators

PR DOCKET NO. 93-305

COMMENTS

ISSUANCE OF 1 X 1 CALL SIGNS

1. The Vanity Call Sign System should include provisions for the issuance of 1 X 1 call signs (a single letter, W, K or N, followed by a single numerical digit, followed by a single letter.) Although such call signs are within the ITU allocation for the United States, they have never been issued.

2. As there are only 780 available, 1 X 1 calls will be highly desired. Their issuance represents a substantial revenue raising opportunity. A premium initial fee (\$1,000, \$2,500 or even \$5,000) should be charged for a 1 X 1 call sign, in addition to any other vanity call sign fee.

3. Due to the limited availability, 1 X 1 call signs should only be available to amateurs licensed for twenty-five or more years and currently holding an Extra Class license.

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2 PROCEDURES OF THE VANITY CALL SIGN SYSTEM

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4 4. There is a great deal of interest and excitement in the
5 amateur radio community as a result of the vanity call sign
6 system proposal. The FCC should anticipate an initial deluge of
7 thousands, perhaps tens of thousands of applications for vanity
8 call signs.

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10 5. With regard to Section 97.19(g)(4), a priority system for
11 accepting and processing applications for vanity call signs must
12 be established, both to spread out the number of applications
13 over a period of time and to recognize achievement and seniority.

14 Priority should be granted based upon class of license held and
15 number of years the applicant has held an amateur radio license.
16 In the past, extra class amateurs licensed for twenty-five or
17 more years were able to request specific call signs. Such
18 precedent should be recognized with a priority in the vanity call
19 sign system.

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21 There should be no other priorities, ie., licensees who have
22 previously held a call sign should not be given priority for that
23 call sign.

1 The following periods of initial application eligibility are
2 proposed:

3 1st 30 days: Extra Class Licensees - 25+ years licensed

4 2nd 30 days: Extra Class Licensees - 10+ years licensed

5 3rd 30 days: All Extra Class Licensees

6 4th 30 days: Advanced Class Licensees - 25+ years licensed

7 5th 30 days: Advanced Class Licensees - 10+ years licensed

8 6th 30 days: All Advanced Class Licensees

9 7th 30 days: General Class Licensees - 25+ years licensed

10 8th 30 days: General Class Licensees - 10+ years licensed

11 9th 30 days: All General Class Licensees

12 Thereafter: Any Licensee

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14 6. The 610V application should provide a place for applicants to
15 list the date initially licensed and call signs held since such
16 date for seniority verification purposes.

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18 7. To insure fairness, and to avoid a large backlog of
19 applications building up, within a priority classification all
20 applications received on the first day of eligibility should be
21 processed prior to applications received on the second day, etc.
22 As a matter of logistics, applications received on the same day
23 must be processed at random. This will prevent over-enthusiastic
24 licensees from gaining an advantage by submitting a 610V in
25 person.
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2 8. With regard to Section 97.19(g)(1), the list of ten call signs
3 should allow for wildcard requests, such as "any remaining W6 two
4 letter call."

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6 9. Call districts are a thing of the past, since Licensees are no
7 longer required to sign portable or be issued a new call sign
8 when they change their residency. Therefore there should be no
9 call district geographical restrictions on vanity call sign
10 applications.

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12 10. Call signs are licensed to an individual and should not be
13 transferable. Some licensees feel they should be allowed priority
14 to request the call sign of a deceased relative. This is not fair
15 and should not be allowed.


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17 DISSEMINATION OF AVAILABLE CALL SIGN INFORMATION

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19 11. With regard to the request for comments on how, short of on-
20 line access, call sign availability can be made, it is pointed
21 out in III. DISCUSSION, at paragraph 7 that, "Our amateur service
22 licensee data base is widely available from entrepreneurs and
23 bulletin boards in practically all forms of magnetic media."

24 All that needs to be done to have the private sector provide this
25 service is to make updates to the licensee data base available to
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1 the current private sector providers of such information on a
2 more frequent basis, perhaps once a week or once a month, instead
3 of quarterly.

4 Respectfully Submitted,

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